

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LAS MARTAS, INC.

Debtor.

CONDADO 5, LLC,  
Movant,

vs.

LAS MARTAS, INC.,  
Respondent,

and

MONSITA LECAROS ARRIBAS, Assistant U.S  
Trustee, JOSE RAMON CARRION MORALES,  
Standing Chapter 12 Trustee,  
Parties in interest.

CASE NO. 22-02380 (ESL)

CHAPTER 12

RELIEF FROM STAY

11 U.S.C. 362(d)

**MOTION FOR LEAVE TO FILE DOCUMENTS IN SPANISH  
AND REQUEST TO SHORTEN OBJECTION NOTICE**

TO THE HONORABLE COURT:

COMES NOW secured creditor Condado 5, LLC ("Condado"), through the undersigned counsel, and respectfully states and prays as follows:

1. On July 2, 2025, Condado filed a *Motion for Relief from Stay* (ECF No. 211). A hearing to consider the *Motion for Relief from Stay* is scheduled for July 22, 2025, at 9:00a.m. Id.

2. In its *Motion for Relief from Stay*, Condado refers and/or cites certain documents in the Spanish language. See ECF Nos. 211-1 through 211-41.

3. For the sake of judicial economy, Condado seeks leave to submit the exhibits of the *Motion for Relief from Stay* (ECF Nos. 211-1 through 211-41) in Spanish and, if an appeal should be taken, Condado will submit certified translations.

4. Condado also requests the Court to shorten the ordinary 14-day objection period of the instant motion to two (2) business days, through and including Monday, July 21, 2025, as the hearing to consider the *Motion for Relief from Stay* is scheduled for July 22, 2025. See ECF No. 211.

WHEREFORE, Condado respectfully prays the Court to shorten the ordinary 14-day objection period of the instant motion to two (2) business days, through and including Monday, July 21, 2025, and grants it leave to submit the exhibits of the *Motion for Relief from Stay* (ECF Nos. 211-1 through 211-41) in Spanish and, if an appeal should be taken, Condado will submit translations.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 17<sup>th</sup> day of July, 2025.

Shortened Objection Notice - PR LBR 9013-1(c)(1)

Within two (2) business days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

Certificate of Service

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system which will send notification of such filing to all Next Gen CM/ECF participants in this case, including the Debtor's counsel, the Chapter 12 Trustee, and the U.S. Trustee for Region 21. Motions and orders processed through CM/ECF are "presumed to be served on the same date of the electronic filing". P.R. Elec. Power Auth. v. Vitol, Inc., 298 F.R.D. 23, 26 (D.P.R.2014).

**Ferraiuoli LLC**

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